

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE: )  
 )  
ROBERTS, WILLIAM BARRIER ) CASE NO. 18-83442-CRJ11  
SSN: XXX-XX-9314 ) CHAPTER 11  
 )  
Debtor. )

**APPLICATION OF MAPLES LAW FIRM, PC,  
ATTORNEYS FOR THE DEBTOR,  
FOR FINAL COMPENSATION AND REIMBURSEMENT OF EXPENSES**

**PART I. COVER SHEET**

1. Name of Applicant: Maples Law Firm, PC
2. Date Application for Employment was filed: 11-19-18
3. Date of Order Authorizing Employment: 1-4-19
4. Professional Services Provided to: Debtor
5. Period for which Compensation is Sought: 2/1/20 – 7/31/20
6. Amount of Fees Sought: \$33,482.50; Reimbursable Expenses: \$15.00
7. This is a *Final Fee Application*.
8. The aggregate amount of fees and expenses approved to date: \$58,368.80
9. The aggregate amount of fees and expenses allowed per the Order dated February 15, 2019 [Doc. 51]: \$27,786.00
10. The 20% allowance to be approved on this application: \$6696.50
11. The aggregate amount of fees and expenses paid to date: \$58,268.00

Dated September 10, 2020.

/s/STUART M. MAPLES  
STUART M. MAPLES

MAPLES LAW FIRM, PC  
200 CLINTON AVE. WEST, SUITE 1000  
HUNTSVILLE, AL 35801  
(256) 489-9779 – TELEPHONE  
(256) 489-9720 – FACSIMILE  
[smaples@mapleslawfirmpc.com](mailto:smaples@mapleslawfirmpc.com)

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE:	)	
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ROBERTS, WILLIAM BARRIER	)	CASE NO. 18-83442-CRJ11
SSN: XXX-XX-9314	)	CHAPTER 11
	)	
Debtor.	)	

**PART II – VERIFICATION OF APPLICATION**  
**FOR COMPENSATION AND EXPENSES**

The undersigned, having been duly sworn, certifies that Stuart M. Maples is the person signing and certify matters contained within the Final Application for Compensation and Reimbursement for Expenses filed with this Court. All matters set forth in the Application for Compensation are true and correct to the best of his knowledge and belief.

/s/ Stuart M. Maples  
STUART M. MAPLES  
Affiant

SWORN TO AND SUBSCRIBED before me on September 10, 2020.

/s/Kristin Pickett  
Notary Public  
My Commission Expires: 5/19/21

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE: )  
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ROBERTS, WILLIAM BARRIER ) CASE NO. 18-83442-CRJ11  
SSN: XXX-XX-9314 ) CHAPTER 11  
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Debtor. )

**PART III. FINAL APPLICATION FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

COMES NOW, the Maples Law Firm, P.C. and its Attorneys (hereinafter "Applicant"), as counsel for William Barrier Roberts, Debtor in Possession ("Debtor") and says:

I. INTRODUCTION

1. That Applicant makes this final application for compensation and reimbursement of actual and necessary costs and expenses incurred by it in the course of its representation of the Debtor through January 20, 2020.
2. The Chapter 11 bankruptcy petition for Debtor was filed with this Court on November 16, 2018.
3. This Court entered an order approving the employment of Stuart M. Maples and the firm of Maples Law Firm, P.C. as counsel for Debtor on January 4, 2019.
4. All services for which compensation is requested by this Applicant were performed for and on behalf of the Debtor and not on behalf of any other person.
5. The results achieved to date have required a substantial expenditure of time, energy and expertise. As a consequence, the Debtor has required active legal representation of the highest caliber on an on-going basis in order to serve its needs in the Chapter 11 proceeding.

6. Applicant makes this application under 11 U.S.C. § 330 and 331 of the Bankruptcy Code and seeks allowance of reasonable compensation for the professional services which it has rendered and for reimbursement of the actual necessary expenses which it has incurred in connection herewith.
7. Applicant has rendered services on behalf of Debtor as shown in Exhibit "A". Applicant, therefore, seeks an allowance of final compensation in the amount of \$33,482.50 for professional services rendered as counsel for the Debtor and the reimbursement of actual expenses incurred in the amount of \$15.00 for representation from February 1, 2020 through July 31, 2020.
8. Professional services required in this matter and described in this application were performed by an attorney who possesses experience and skills in the area in which he rendered services. Attorney fees awarded pursuant to this application shall not be shared or divided except as allowed by law.
9. Applicant represents that the allowance for final compensation and reimbursement of expenses required herein is reasonable and fully complies with § 331 of the Bankruptcy Code.

WHEREFORE, PREMISES CONSIDERED, Applicant respectfully requests that it be allowed the sum of \$33,482.50 as final compensation for professional services rendered as attorney for the Debtor and for reimbursement of actual and necessary expenses incurred in the amount of \$15.00 from February 1, 2020 through July 31, 2020, and that it be granted such further and additional relief as this Court may deem just and proper.

Dated September 10, 2020.

/s/ Stuart M. Maples

Stuart M. Maples  
Counsel for Debtor

Maples Law Firm, P.C.  
200 Clinton Ave. West, Suite 1000  
Huntsville, AL 35801  
(256) 489-9779 (telephone)  
(256) 489-9720 (facsimile)  
[smaples@mapleslawfirm.com](mailto:smaples@mapleslawfirm.com)

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true and correct copy of the foregoing document upon the following either by U.S. Mailing, proper addressed, or electronic mail on September 10, 2020.

Richard Blythe  
Bankruptcy Administrator  
P. O. Box 3045  
Decatur, AL 35602

Kevin Morris  
Attorney for Trustee  
Via email: [kevin@ssmattorneys.com](mailto:kevin@ssmattorneys.com)

All parties requesting notice via the Court's ECF system

20 Largest Creditors via US Mail

/s/ Stuart M. Maples  
Stuart M. Maples

**Maples Law Firm, PC**  
200 Clinton Avenue West, Suite 1000  
Huntsville, Alabama 35801  
256.489.9779  
Tax ID No. 26-2476092  
**STATEMENT FOR SERVICES RENDERED**

Bill Roberts  
3316 Ohara Rd. SW  
Huntsville AL 35801

Page: 1  
03/11/2020  
Account No: 949-000M  
Statement No: 113656

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
02/03/2020	SMM	Telephonic conference with Court	360.00	1.00	360.00
02/04/2020	SMM	Attend mediation	360.00	4.00	1,440.00
02/05/2020	SMM	Worked on stock sale	360.00	0.75	270.00
02/12/2020	KM	Redact, finalize and e-file DIP Monthly Operating Reports for November 2019 and December 2019	55.00	0.50	27.50
02/13/2020	SMM	Review Reed deposition	360.00	2.00	720.00
02/14/2020	SMM	Meeting with client and Callahan	360.00	1.00	360.00
	SMM	Review pretrial disclosure	360.00	0.50	180.00
02/17/2020	SMM	Worked on confirmation and other settlement issues	360.00	4.00	1,440.00
02/18/2020	KM	Review and respond to email from counsel for AMEX regarding ballot for voting on Plan	55.00	0.25	13.75
	SMM	Worked on AMEX vote	360.00	0.50	180.00
02/24/2020	KP	Receive and review Ballot Accepting Plan filed by AMEX National Bank, print and save to file	125.00	0.25	31.25
	KP	AP Case: Receive and review filed-stamped copy of Debtor's Objection to W&E list filed by M. Murray, M. Murray & B&B's Objection to W&E list filed by Debtor, and Reply to Debtor's Response to Motion for Summary Judgment; print and save to file	125.00	0.25	31.25
	SMM	Attend summary judgment hearing	360.00	0.75	270.00
	SMM	Worked on pretrial disclosures	360.00	2.00	720.00
02/25/2020	KP	Receive and review Order on Objection to Claim No. 11 filed by Murray, print and save to file	125.00	0.25	31.25
	KP	AP Case: Receive and review Order on (1) Objections to Exhibits Listed by Counterclaim Plaintiffs and (2) Counterclaims Plaintiffs' Objections to Debtor's Witness and Exhibit List, and Order (1) Approving Defendant's Motion for Summary Judgment (2) Approving Plaintiff/Counter-Defendant's Motion for Summary Judgment and (3) Extending Deadline to File Joint Pretrial Order; print, calendar and save to file; confer w/ SMM re: proposed pretrial order due 2/28; email exchange w/ C. Roote re: copies of			

## Chapter 11 Bankruptcy

			Rate	Hours	
		deposition transcripts exhibits; receive and upload same; review and analyze Moon Construction contraction and change orders	125.00	1.00	125.00
	MEH	Discussed results of Murrays' MSJ with SMM; discussed strategy for potential dissolution of LLC in circuit court	225.00	0.50	112.50
	SMM	Meeting with client and Callahan	360.00	1.00	360.00
	SMM	Prepare for hearing	360.00	5.00	1,800.00
02/26/2020	KP	Receive documents from J. Callahan re: Moon Construction; scan to file and Bates Label	125.00	0.75	93.75
	SMM	Prepare for hearing	360.00	3.50	1,260.00
02/27/2020	KM	Draft motion to continue confirmation and associated deadlines; draft motion to continue trial date and associated deadline; forward same to SMM for further editing; finalize and e-file both motions with the Court; prepare and mail same to all creditors listed on the mailing matrix and all other parties requesting notice	55.00	1.00	55.00
	SMM	Prepare for hearing; draft motion to continue	360.00	0.75	270.00
02/28/2020	KP	Receive and review Order Setting Telephonic Status Conference on Motion to Continue Confirmation and all Associated Deadlines and Order Setting Telephonic Status Conference on Motion to Continue Trial and all Associated Deadlines; print, calendar and save to file; forward Moon Construction documents to D. Kelley and C. Pereyda for review and comment	125.00	0.25	31.25
	MEH	Researched judicial dissolution; memo to SMM; wait until other matters are resolved	225.00	1.00	225.00
	KM	Draft joint proposed pretrial order; forward same to SMM for further editing; draft supplement to Motion to Continue Trial and Motion to Continue Confirmation Hearing; forward same to SMM for review; finalize and e-file same with Court; prepare and mail same to all creditor listed on the mailing matrix and all other parties requesting notice	55.00	1.25	68.75
		For Current Services Rendered		34.00	10,476.25
		Total Current Work			10,476.25



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Bill Roberts  
 3316 Ohara Rd. SW  
 Huntsville AL 35801

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 04/09/2020  
 Account No: 949-000N  
 Statement No: 113769

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
03/02/2020	KM	Identify, gather, and organize documents pertinent to 3/2/2020			
		telephonic hearing; create hearing folder for same	55.00	0.25	
	SMM	Telephone call to client re confirmation	360.00	0.75	270.00
03/05/2020	KM	Prepare and mail new ballot and Order Continuing Confirmation			
		Hearing and Related Deadlines and Extending Time for Filing			
		Objections to Confirmation and Time for filing Ballots to all creditors			
		listed on the mailing matrix; draft COS regarding same; finalize and			
		e-file with Court	55.00	0.75	41.25
03/25/2020	KM	revise Summary of Ballots	55.00	0.25	13.75
		For Current Services Rendered		2.00	325.00
		Total Current Work			325.00

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 Huntsville AL 35801

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 05/07/2020  
 Account No: 949-000M  
 Statement No: 113864

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
04/09/2020	SMM	Worked on opposition to stay relief	360.00	5.00	1,800.00
04/14/2020	KM	Draft Response to Motion for Relief from Stay; pull cases from Westlaw pertinent cases to response motion; forward same to SMM for review and further editing	55.00	1.75	96.25
04/15/2020	KM	Review email from SMM; revise Response to Motion for Relief from Stay; email same to SMM for further review/editing; emails to and from SMM regarding same; email draft of response to J. Callahan for review and comment;	55.00	0.75	41.25
	SMM	Worked on response to stay	360.00	2.00	720.00
04/16/2020	KM	Revise response to motion for relief from stay; emails to and from SMM and J. Callahan; additional revisions to motion; finalize same with corresponding exhibit; e-file same with Court	55.00	0.75	41.25
	SMM	Prepare for hearing	360.00	2.00	720.00
04/17/2020	KM	Identify, gather, and organize documents pertinent to 4/20/2020 hearings; create hearing folders for same	55.00	0.50	27.50
04/18/2020	KM	Revise hearing folder to include Reply Brief filed by Murray and B&B; forward same to SMM	55.00	0.25	13.75
04/20/2020	SMM	Attend hearing on stay relief; prepare for hearing	360.00	3.00	1,080.00
04/21/2020	SMM	Worked on settlement	360.00	4.00	1,440.00
04/22/2020	SMM	Worked on settlement	360.00	2.00	720.00
04/24/2020	SMM	Worked on settlement	360.00	2.00	720.00
04/25/2020	SMM	Worked on settlement	360.00	4.00	1,440.00
04/27/2020	MEH	Conf with SMM re bankruptcy issues and research needs; researched procedural question and sent SMM information	225.00	0.50	112.50
04/28/2020	MEH	Research on executory contracts; research on conversion of estate; memos to SMM	225.00	1.75	393.75

Bill Roberts

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05/07/2020

Account No: 949-000V

Statement No: 113864

Chapter 11 Bankruptcy

	Rate	Hours	
For Current Services Rendered		30.25	9,366.25
Total Current Work			9,366.25

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Maples Law Firm, PC  
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Huntsville, Alabama 35801  
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Bill Roberts  
3316 Ohara Rd. SW  
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06/10/2020  
Account No: 949-000M  
Statement No: 113959

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
05/05/2020	KM	Begin draft of disclosure of inheritance; email to SMM regarding same	55.00	0.50	27.50
05/06/2020	SMM	Worked on disclosure of inheritance	360.00	2.50	900.00
05/08/2020	KM	Revise disclosure of inheritance; forward same to SMM for further editing	55.00	0.25	13.75
05/11/2020	KM	Emails to and from SMM; revise Debtor's Disclosure of Inheritance; finalize and e-file same with Court	55.00	0.75	41.25
05/12/2020	SMM	Attend emergency hearing on motion to lift stay	360.00	1.50	540.00
	SMM	Worked on rejection of contract	360.00	2.75	990.00
05/13/2020	SMM	Worked on rejection	360.00	2.00	720.00
05/28/2020	KM	Draft proposed order on Fourth Application for Compensation; forward same to Judge's proposed orders queue	55.00	0.50	27.50
		For Current Services Rendered		10.75	3,260.00
		Total Current Work			3,260.00

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07/10/2020  
Account No: 949-000M  
Statement No: 114046

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
06/01/2020	SMM	Worked on motion to modify; motion to reject	360.00	2.90	1,044.00
06/03/2020	SMM	Worked on motions to amend; motion to convert	360.00	2.50	900.00
06/04/2020	KM	Revise Debtor's Motion for Entry of Order Authorizing Rejection of Certain Executory Contracts and Pre-Confirmation Modification of Plan; forward same to SMM for further editing	55.00	0.50	27.50
	SMM	Review agreement	360.00	1.50	540.00
06/05/2020	KM	Additional revisions to Debtor's Motion for Entry of Order Authorizing Rejection of Certain Executory Contracts and Pre-Confirmation Modification of Plan; finalize and attach exhibits; draft Motion to Convert to Chapter 7; forward same to SMM for further editing; finalize and e-file both Motions; prepare and mail same to all creditors on mailing matrix	55.00	1.75	96.25
06/10/2020	KM	Draft Notice of Death of Debtor; forward same to SMM for review	55.00	0.25	13.75
06/12/2020	KM	Revise Memorandum in Support of Confirmation; revise ballot summary; forward same to SMM for further editing	55.00	0.50	27.50
06/15/2020	SMM	Worked on memorandum and ballot summary	360.00	1.50	540.00
06/16/2020	KM	Meet with SMM; finalize Notice of Death of Debtor and corresponding exhibit; e-file same with Court; revise Memorandum in Support of Confirmation and Summary of Ballots; finalize and e-file both pleadings with Court; prepare and mail service copy of each to all creditors listed on the mailing matrix and all other parties requesting notice; additional revising	55.00	1.75	96.25
06/17/2020	SMM	Worked on memorandum and Plan	360.00	4.50	1,620.00
06/22/2020	KM	Identify organize and gather docs pertinent to 6/22/2020 hearing; create folder for same	55.00	0.25	13.75
	SMM	Attend hearing	360.00	0.50	180.00
06/23/2020	SMM	Meeting with Owen and John	360.00	1.00	360.00
06/24/2020	SMM	Meeting with Trustee	360.00	1.00	360.00

## Chapter 11 Bankruptcy

			Rate	Hours	
3/2020	SMM	Worked on Order	360.00	0.50	180.00
		For Current Services Rendered		20.90	5,999.00
		<u>Expenses</u>			
5/2020		Filing Fee for Motion to Convert Case to Chapter 7			15.00
		Total Expenses			15.00
		Total Current Work			6,014.00

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08/11/2020  
Account No: 949-000M  
Statement No: 114128

Chapter 11 Bankruptcy

Fees

			Rate	Hours	
7/01/2020	SMM	Worked on 341 meeting	360.00	0.50	180.00
7/02/2020	SMM	Research inheritance issue	360.00	4.00	1,440.00
7/06/2020	SMM	Worked on account discovery	360.00	2.00	720.00
7/13/2020	KM	Emails to and from SMM regarding Trustee's Motion to Compel; identify, gather, and organize documents pertinent to 7/14/2020 hearing; create hearing folder for same; forward same to SMM	55.00	0.50	27.50
7/14/2020	SMM	Attend hearing	360.00	0.50	180.00
7/17/2020	SMM	Worked on response to requests	360.00	1.25	450.00
7/23/2020	KM	Draft response template to show cause order; forward same to SMM for further editing; revise same; finalize and e-file with Court; prepare and mail same to all creditors listed on the mailing matrix and all other parties requesting notice	55.00	0.75	41.25
7/27/2020	KM	Identify, organize, and gather documents pertinent to 7/27 hearings in BK and AP matters ; create hearing folders for same	55.00	0.50	27.50
	SMM	Attend hearing	360.00	0.75	270.00
7/29/2020	SMM	Conference with Owen and Kevin Heard	360.00	0.75	270.00
7/31/2020	SMM	Attend 341 meeting	360.00	1.25	450.00
		For Current Services Rendered		12.75	4,056.25
		Total Current Work			4,056.25